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6 Attorneys for Plaintiff,
GEORGIA-PACIFIC CONSUMER PRODUCTS LP
7

8 IN THE UNITED STATES DISTRICT COURT

9 FOR THE SOUTHERN DISTRICT OF CALIFORNIA

10 GEORGIA-PACIFIC CONSUMER
PRODUCTS LP, a Delaware limited
11 partnership,

12 Plaintiff,

13 v.

14 LEE'S GENERAL TOYS, INC., a California
corporation, JOHN LEE, an individual; and
15 DOES 1-100,

16 Defendants.
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FILED

2007 DEC 20 PM 12:51

CLERK US DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

BY LNK DEPUTY

Civil Action No.

07 CV 2391 BTM AJB

**DECLARATION OF DARWIN D.
WISDOM IN SUPPORT OF PLAINTIFF
GEORGIA-PACIFIC CONSUMER
PRODUCTS LP'S EX PARTE
APPLICATION FOR A TEMPORARY
RESTRAINING ORDER AND ORDER TO
SHOW CAUSE RE PRELIMINARY
INJUNCTION**

**DATE: TBD
TIME: TBD
CTRM: TBD**

1 I, Darwin D. Wisdom, hereby declare as follows:

2 1. I am an employee of The Baker Street Group, Inc., a team of private investigators
3 located in San Diego, California. I served for twenty-seven years as an Agent for the Federal
4 Bureau of Investigations and am licensed by the State of California as a Private Investigator. I
5 have been retained to investigate sales and distribution of "Angelite" or "Angel Lite" (hereinafter
6 referred to collectively as "Angelite") bathroom tissue products. I have personal knowledge of
7 the matters set forth herein, and if I am called upon to testify, I could and would testify
8 competently thereto.

9 **METHODS OF INVESTIGATION**

10 2. As described in greater detail below, I visited retail locations believed to sell
11 "Angelite" bathroom tissue products. I observed inventory and spoke to either proprietors or
12 employees of these establishments. I also used computer databases, both public and
13 subscription-based to obtain business-related information.

14 **LEE'S GENERAL TOYS AND ITS AFFILIATED BUSINESSES**

15 3. I was informed that Lee's General Toys, 3389 East 50th Street, Vernon,
16 California 90058 is the owner of a California trademark registration for the mark "Angel Lite
17 500" in a stylized design. See Exhibit ("Ex.") 1 hereto. I conducted public records searches for
18 Lee's General Toys, 3389 East 50th Street, Vernon, California 90058. From those searches, I
19 determined that the California Secretary of State records list Lee's General Toys as a California
20 corporation with a principal place of business at 3389 East 50th Street, Vernon, California
21 90058. I also determined that John Lee is the President of Lee's General Toys and that the agent
22 for service of process for Lee's General Toys is listed as John Lee, at the above address.

23 4. I was informed that the attorney of record for Lee's General Toys, as listed in the
24 "Angel Lite 500" California state Trademark registration, is David W. Lee. Through a search of
25 California State Bar Association records, I confirmed that Mr. Lee's address is 108 North Ynez
26 Avenue, Suite 128, Monterey Park, California. On August 15, 2007, I personally visited and took
27 photographs of the office building at this location. Exhibits 2-4 to this declaration are the
28 photographs I took of the office building at this address.

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BAKER STREET GROUP

011

1 5. On August 15, 2007, I visited Lee's General Toys at 3389 East 50th Street,
2 Vernon, California 90058. I observed a warehouse type facility with an "eighteen wheeler"
3 trailer backed up to one of the warehouse doors. I observed open plastic bundles of "Angelite"
4 products on the premises. Exhibits 5-9 to this declaration are true and accurate photographs that
5 I took of that location.

6 6. On August 28, 2007, I visited Lee's General Toys again. I spoke with Mr. John
7 Lee who informed me that he sells "Angelite" products which he imports directly from China.

8 I declare under penalty of perjury under the laws of the United States that the foregoing is
9 true and correct and that this declaration was executed by me on this 18 day of December 2007.

Darwin D. Wisdom
Darwin D. Wisdom

Darwin D. Wisdom

EXHIBITS

1
2 1. EXHIBIT 1: California trademark registration for the mark "Angelite" in a
3 stylized design registered to Lee's General Toys, 3389 East 50th Street, Vernon, California
4 90058.

5 2. EXHIBIT 2: Photograph of the directory of businesses and tenants occupying
6 space in the building located at 108 North Ynez Avenue, Suite 128, Monterey Park, California,
7 showing the office of D. Lee at Suite 202.

8 3. EXHIBIT 3: Photograph of the directory of businesses and tenants occupying
9 space in the building located at 108 North Ynez Avenue, Suite 128, Monterey Park, California,
10 showing the office of D. Lee at Suite 202.

11 4. EXHIBIT 4: Photograph of the exterior of the building located at 108 North Ynez
12 Avenue, Suite 128, Monterey Park, California.

13 5. EXHIBIT 5: Photograph of a sign for "General Toys," located at 3389 East 50th
14 Street, Vernon, California 90058.

15 6. EXHIBIT 6: Photograph of the exterior of the warehouse building located at
16 3389 East 50th Street, Vernon, California 90058.

17 7. EXHIBIT 7: Photograph of the rear loading-dock area of the warehouse building
18 located at 3389 East 50th Street, Vernon, California 90058.

19 8. EXHIBIT 8: Photograph of the rear/side loading-dock area of the warehouse
20 building located at 3389 East 50th Street, Vernon, California 90058.

21 9. EXHIBIT 9: Photograph of the interior of the warehouse building located at 3389
22 East 50th Street, Vernon, California 90058, showing boxes that appear to bear the script mark
23 "Angelite 1500."

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California Trademarks

Get Trademark Design

Trademark Name: ANGEL LITE 500

(WORDS AND DESIGN)

Serial Number: 69400178

Official Status: REGISTERED

Status Date: August 25, 2003

Goods/Services: TOILET PAPER, BATHROOM TISSUE AND TISSUE PAPER

International Class: 16 (PAPER GOODS AND PRINTED MATTER) - PRIMARY CLASS

U.S. Class: 37 (PAPER AND STATIONERY) - SECONDARY CLASS

State of Registration: CALIFORNIA

Registration Number: 109437

Registration Date: August 25, 2003

Active/Inactive: ACTIVE

First Use Date: January 31, 2002

Word Count: 3

Description of Mark: THE MARK COMPRISES THE WORDS "ANGEL LITE" AND A STAR DESIGN
DISPOSED IN THE MIDDLE OF AN OVAL, AND THE DIGITS "500" DISPOSED BENEATH THE WORDS
"ANGEL LITE" INSIDE THE OVAL

***** OWNERSHIP INFORMATION *****

Owner: LEE'S GENERAL TOYS, INC. (CALIFORNIA CORPORATION)
3389 E. 50TH STREET
VERNON, CA 90058
AS OF August 25, 2003

Registrant: LEE'S GENERAL TOYS, INC. (CALIFORNIA CORPORATION)
3389 E. 50TH STREET
VERNON, CA 90058
AS OF August 25, 2003

Angel fite
500

DIRECTORY

110 TSOI & ASSOCIATES, LAWYERS

120 DAVID & RAYMOND PATENT FIRM

130 ASIAMERICA GROUP

201 GATEWAY TRAVEL
203 GEORGE CO.

203 LAT OFFICE OF P LES
LTY NET SOLUTIONS

205 CHENING INT'L INC.
US. SINO ECONOMIC & CULTURAL EXCHANGE

204 DAVID AND RAYMOND
206

207 GOLDEN TIME REALTY

208

209 BENEGASE LIMITED PARTNERSHIP

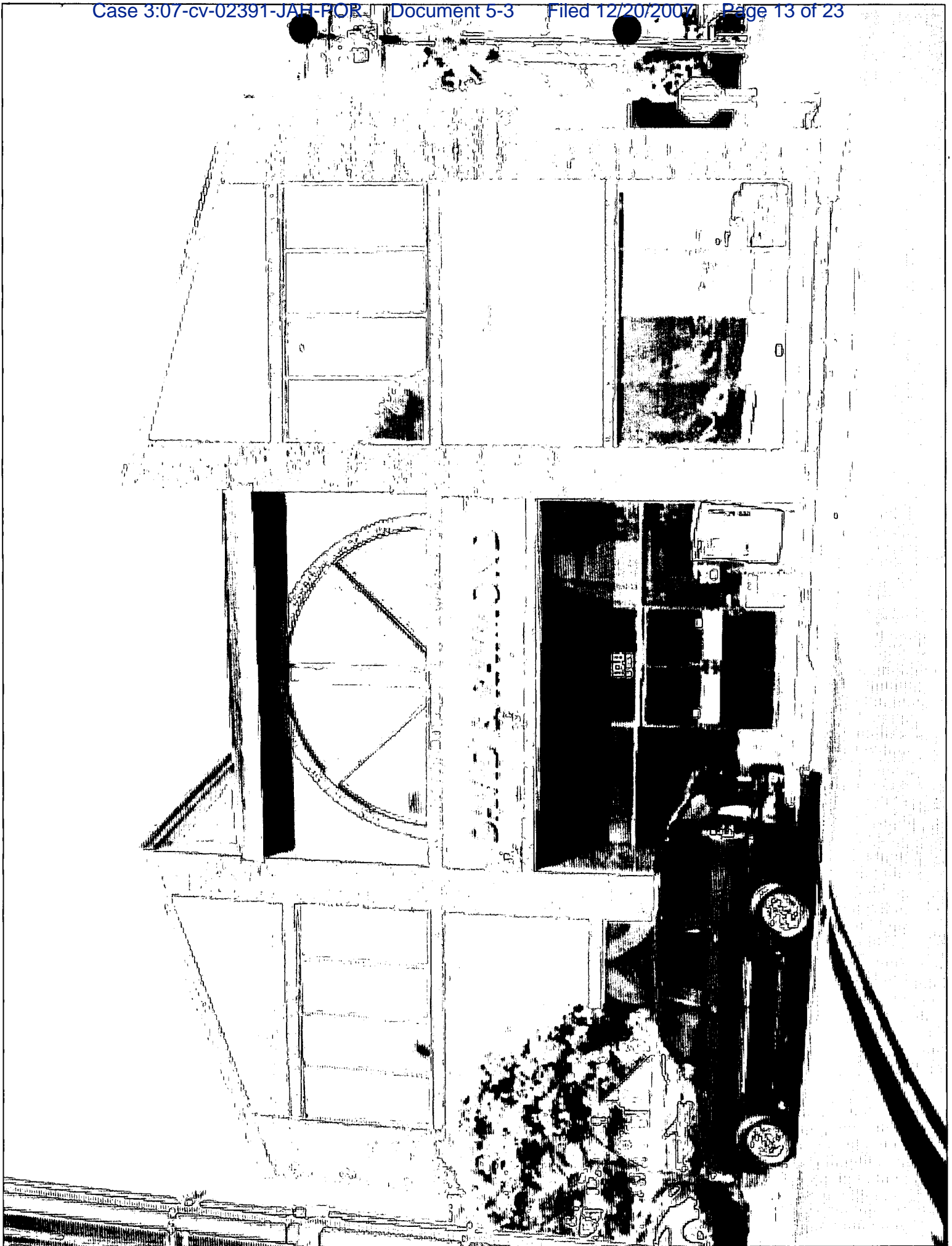
211 LAN OFFICES OF PING C. SHEN

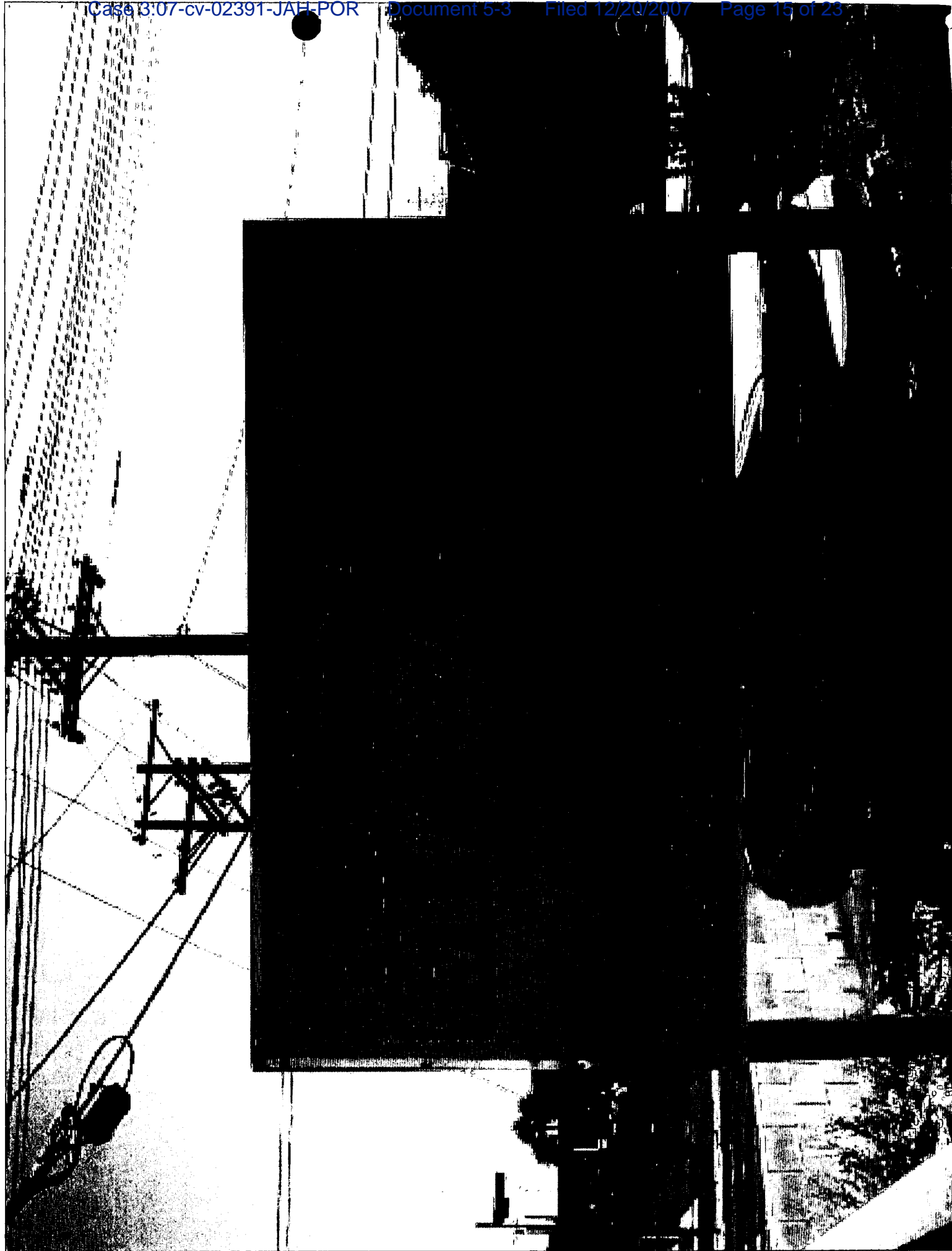
213 APEX SCHOLASTIC & FINANCIAL

DIRECTORY

1B TSOI & ASSOCIATES, LAWYERS
2B DAVID & RAYMOND PATENT FIRM
00 ASIAMERICA GROUP
01 CATHAY TRAVEL
03 GRACE CO.
02 LAW OFFICE OF D LEE
LTT NET SOLUTIONS
05 CITSLINC INT'L INC.
US. SINO ECONOMIC & CULTURAL EXCHANGE
04 DAVID AND RAYMOND
06
07 GOLDEN TIME REALTY
08

... LIMITED PARTNERSHIP





GENERAL TOYS
IMPORT WHOLESALES
TOYS WITH BLENDED

13386

